



spent approximately three thousand (\$3,000) dollars attempting to come to Court at that time. Defendant currently has limited resources to effectuate a return in January.

5. Since that Court date, the Government has had some difficulty in providing a manner for this Defendant to get into the Country and before the Court.

Ultimately, an Order of this Court dated December 8, 2014 was determined to provide the authority Defendant needs for safe passage to Court (Docket entry #61). This Order provides that Defendant shall be in violation of his bond and in contempt of court should he not appear at this hearing.

6. Counsel and the government are still discussing the case, but at this time, this Defendant does not wish to enter a plea of guilty, and Defendant has instructed his counsel to prepare for trial.

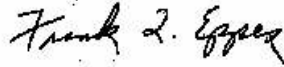
6. Defendant does not want to go to the time and expense of travelling to South Carolina for a Pre-Trial Conference/Change of Plea hearing in which the matter will not be resolved.

7. Defendant avers that, since he has waived his right to attend these hearings, and he does intend to return to South Carolina for his trial, that this Court should withdraw its Order, allow him to request a trial through his attorney and set the jury trial date in the normal course of the Court's business.

Counsel has previously consulted with Assistant United States Attorney David Stephens concerning this issue and believes the Government will oppose this request.

Respectfully submitted this the 15th day of January, 2015.

Eppes & Plumblee, P.A.

A handwritten signature in black ink, appearing to read "Frank L. Eppes".

Fed. ID No 1003

P.O. Box 10066, Greenville, South Carolina 29603

864-235-2600 Fax 864-235-4600

[feppes@eppesandplumblee.com](mailto:feppes@eppesandplumblee.com)